

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES						yr/mo/day						Inspection Type		Inspector		Fac Type							
1	N		A	K	R	0	6	A	C	9	3	1	7	0	8	2	9	~	R	2					
Remarks																									
21																				66					
Inspection Work Days				Facility Self-Monitoring Evaluation Rating								BI		QA		-----Reserved-----									
67		1	0	69	70								71		72		73		74	75					80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time/Date 8:50am / 8/29/2017	Permit Effective Date August 20, 2015
Alaska Department of Transportation - Wrangell Airport Airport Road, Wrangell, AK 99929	Exit Time/Date 11:35am / 8/29/2017	Permit Expiration Date March 31, 2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) William Bloom, Airport Manager Phone: 907-874-3107, Email: William.bloom@alaska.gov	Other Facility Data (e.g., SIC NAICS, and other descriptive information) SIC 4851 / NAICS 488119 – Other Airport Operations	
Name, Address of Responsible Official/Title/Phone and Fax Number William Bloom, Airport Manager Alaska Department of Transportation & Public Facilities PO Box 1351, Wrangell, AK 99929 Phone: 907-874-3107, Email: William.bloom@alaska.gov	ADPES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP)	
Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

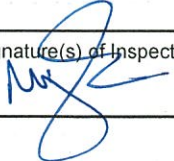
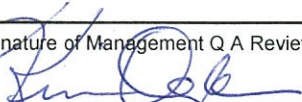
Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/>	Permit	<input checked="" type="checkbox"/>	Self-Monitoring Program	<input type="checkbox"/>	Pretreatment	<input type="checkbox"/>	MS4
<input checked="" type="checkbox"/>	Records/Reports	<input type="checkbox"/>	Compliance Schedules	<input type="checkbox"/>	Pollution Prevention		
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Laboratory	<input checked="" type="checkbox"/>	Storm Water		
<input checked="" type="checkbox"/>	Effluent/Receiving Waters	<input checked="" type="checkbox"/>	Operations & Maintenance	<input type="checkbox"/>	Combined Sewer Overflow		
<input type="checkbox"/>	Flow Measurement	<input type="checkbox"/>	Sludge Handling/Disposal	<input type="checkbox"/>	Sanitary Sewer Overflow		

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
• • • • •	• • • • •
• • • • •	• • • • •
• • • • •	• • • • •
• • • • •	• • • • •

Name(s) and Signature(s) of Inspector(s) Matt Vojik 	Agency/Office/Phone and Fax Numbers EPA /OCE / 206-553-0716	Date 09/01/2017
Signature of Management Q A Reviewer 	Agency/Office/Phone and Fax Numbers EPA/OCE/MIRE 2-0855	Date 3/9/18

ICIS.

9-6-17

J. Brown

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	\$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A	State (Contractor)	O	Other Inspectors, Federal/EPA (Specify in Remarks columns)
B	EPA (Contractor)	P	Other Inspectors, State (Specify in Remarks columns)
E	Corps of Engineers	R	EPA Regional Inspector
J	Joint EPA/State Inspectors—EPA Lead	S	State Inspector
L	Local Health Department (State)	T	Joint State/EPA Inspectors—State lead
N	NEIC Inspectors		

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

APDES Inspection Report

Permit # AKR06AC93

**Alaska Department of Transportation
Wrangell Airport**

Wrangell, AK

August 29, 2017

Prepared by:

**Matt Vojik
Environmental Protection Agency (EPA), Region 10
Office of Compliance and Enforcement (OCE)
Multimedia Inspection & RCRA Enforcement Unit (MIREU)**

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ATTACHMENT A – Aerial Image, Site Map and Quarry Map

ATTACHMENT B – Photograph Log

ATTACHMENT C – NOI dated August 3, 2015

ATTACHMENT D – SWPPP Narrative dated July 2015

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. William Bloom or from observations during the inspection.)

I. Facility Information

Facility Name:	Alaska Department of Transportation - Wrangell Airport
Facility Owner/Operator:	Alaska Department of Transportation and Public Facilities, Southcoast Region
Physical Address:	Airport Road, Wrangell, AK 99929
Lat/Long:	56.484573°, -132.378389°
Mailing Address:	P.O. Box 1351, Wrangell, AK 99929
Facility Contacts:	William Bloom, Airport Manager Phone: 907-874-3107 Email: William.bloom@alaska.gov
Permit Number:	AKR06AC93
NAICS Code:	488119 – Other Airport Operations
Receiving Water:	Eastern Passage

II. Inspection Information

Inspection Date:	August 29, 2017
Inspectors:	Matt Vojik, Inspector EPA Region 10, OCE / MIREU Phone: 206-553-0716
Arrival Time:	8:50 AM
Departure Time:	11:35 AM
Weather:	Sunny
Purpose:	To determine whether the facility is in compliance with their Alaska Pollutant Discharge Elimination System (APDES) permit and the Clean Water Act (CWA).

III. Permit Information

This facility is permitted to discharge under APDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) number AKR06AC93 and operates under Sector S (Air Transportation). The facility's coverage under the MSGP became effective on August 20, 2015. The expiration date of the permit is March 31, 2020. Prior to the current permit, the facility was covered under MSGP number AKR05A667.

IV. Background

The Wrangell Airport is owned and operated by the Alaska Department of Transportation and Public Facilities (ADOT&PF), Southcoast Region, headquartered at 6860 Glacier Highway, Juneau, AK 99801. The airport is managed by three staff, including Mr. William Bloom, Airport Manager, who has worked at the facility for over 30 years.

The airport includes a 6,000-foot runway, an airport rescue and firefighting (ARFF) building and nine tenant buildings. Major commercial airplane traffic consists of two jets per day. The area of industrial activity exposed to stormwater is approximately 173.5 acres. Stormwater flows through a series of infiltration ditches toward two outfalls located on the east and west ends of the runway.

Two maintenance and operations (M&O) buildings are located south of the airport on the south side of Airport Road. The M&O buildings are used for fueling and maintenance of vehicles and equipment and storage of sand and chemicals, such urea, which is used to deice the runway. The facility estimates that 75 to 90 tons of urea is used annually.

Point Highfield Quarry is located at the west end of the runway and used as a material source for local construction projects. The quarry is operated by a contractor on an intermittent basis.

V. Inspection Chronology

This was an unannounced inspection. I arrived at the facility at 8:50am on August 29, 2017. I presented my credentials to Mr. Bloom and provided him an EPA Small Business Resources Information Sheet. I was accompanied throughout the inspection by Mr. Bloom. I was not denied access to the facility.

I began the inspection with a brief opening conference with Mr. Bloom in his office. I took a tour of the facility and conducted a file review. We ended with a closing conference to discuss observations and next steps.

VI. Site Review

Mr. Bloom took me on a tour of the facility. An aerial image and site maps appear in **Attachment A** and a photograph log appears in **Attachment B**.

I inspected the drainage ditch on the southeast side of the runway (**Photo 1**). I followed the path of flow to the monitoring point for Outfall B, where the ditch crosses a fence line before commingling with a creek that flows into Eastern Passage (**Photo 2**).

In the center of the airport, I inspected a series of drainage ditches (**Photo 3**) that flow toward Outfall A (**Photo 4**) at the west end of the runway. Mr. Bloom said that stormwater infiltrates before reaching the outfall and he has never observed a discharge in this area.

Near Outfall A, I also inspected Point Highfield Quarry (**Photo 5**). Mr. Bloom said that stormwater from the quarry is contained by a perimeter berm and infiltrates without discharging to surface water. He also said that the facility finished blasting three to four years ago when the rock was being used for a runway improvement project. Since blasting ended, quarry activities have consisted of intermittent crushing and hauling by contractors for local construction projects.

On the north side of the runway, stormwater sheet-flows to a vegetated area (**Photo 6**), which does not have a designated outfall or monitoring point.

The airport was also equipped with a few small fuel tanks (**Photo 7**) and fuel trucks. Mr. Bloom said the fuel trucks are inspected every quarter. On the south side of Airport Road, I also inspected the maintenance and operations buildings and outdoor tanks used to store magnesium chloride (**Photo 8**) for highway deicing. Mr. Bloom said that he was not aware of past chemical or fuel spills at the facility.

VII. File Review

I reviewed the following records:

- Notice of Intent (NOI) to discharge stormwater associated with industrial activity (**Attachment C**)
- Stormwater Pollution Prevention Plan (SWPPP) dated July 2015 (**Attachment D**)
- Quarterly visual inspection records for 2016 and 2017
- Routine inspection records for 2016 and 2017
- Training records for 2016 & 2017
- Urea application logs

VIII. Areas of Concern

I noted the following areas of concern:

A. Lack of Annual Reports

Part 9.2 of the MSGP states that “a permittee must submit an annual report to DEC that includes the findings from their Part 6.3 comprehensive site inspection and any corrective action documentation as required in Part 8.4.”

At the time of the inspection, the facility did not have records of annual reports submitted to the Alaska Department of Environmental Conservation (DEC) per Part 9.2 of the MSGP. Mr. Bloom said that he was not aware of the annual reporting requirement, although the facility did not have corrective actions to report.

B. Samples Not Collected within 30 Minutes of Discharge

Part 7.1.4 of the MSGP states that “samples must be collected within the first 30 minutes of a discharge produced from a measurable storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes and documentation must be kept with the SWPPP explaining why it was not possible to take samples within the first 30 minutes.”

When conducting quarterly visual stormwater assessments, Mr. Bloom said that he was not aware of the requirement to collect samples within the first 30 minutes of a discharge. I pointed out that the purpose of sampling within the first 30 minutes of discharge is to ensure that the sample is representative of the industrial nature of the discharge per Part 3.1 of Appendix A of the MSGP. Note that discharges occur at Outfall B, but Mr. Bloom said that he has never observed a discharge from Outfall A.

C. MSGP Coverage for Point Highfield Quarry

Part 11.J of the MSGP includes sector-specific requirements for Sector J, “Active, Inactive, or Non-Traditional Non-Metallic Mineral Mining and Dressing facilities,” and states that “the sector-specific requirements apply to those areas of the permittees facility where those sector-specific activities occur. These sector-specific requirements are in addition to any requirements specified elsewhere in this permit.”

Although the airport includes a rock quarry (**Photo 5**), which is represented on the maps in **Attachment A** and the SWPPP narrative in **Attachment D**, I noted that the facility has not identified Sector J as an applicable sector under in the SWPPP or the NOI (**Attachment C**).

In lieu of MSGP coverage, Section 4.2 of the SWPPP states that the “schedule and procedures for monitoring would be developed under the CGP and would be inspected by a designated SWPPP Manager when the quarry is in operation.” Section 5.2 of the SWPPP also states that “when the quarry is in operation, schedule and procedures for inspection will be performed by the designated SWPPP Manager, likely under an Alaska Construction General Permit.”

Mr. Bloom also said that stormwater from the quarry is contained by a perimeter berm and infiltrates without discharging to surface water. He said that the facility finished blasting three to four years ago when the rock was being used for a runway improvement project. Since blasting ended, quarry activities have consisted of intermittent crushing and hauling by contractors for local construction projects. The quarry was not in operation at the time of the inspection.

I advised the facility to review the MSGP for applicable requirements under Sector J. Mr. Bloom said that the appropriate facility contacts for the quarry were Lyn Campbell at ADOT (phone: 907-465-1785) and Sharyn Augustine at Aviation Leasing (phone: 907-495-6893).

IX. Closing Conference

I held a closing conference with Mr. Bloom. We discussed the areas of concern identified during the inspection and I gave a brief overview of the post-inspection process. I thanked him for his time and assistance.

Report Completion Date:

3/1/2018

Lead Inspector Signature:



1. 100%

2010/1/2

2010/1/2

2010/1/2